

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

IN RE NII HOLDINGS INC.
SECURITIES LITIGATION

Civ. No. 1:14-cv-00227-LMB-JFA

**LEAD PLAINTIFFS' MOTION
FOR CLASS CERTIFICATION AND APPOINTMENT
OF CLASS REPRESENTATIVES AND CLASS COUNSEL**

PLEASE TAKE NOTICE that Lead Plaintiffs Danica, Industriens, Operating Engineers Pension Trust Fund, IBEW Local No. 58 / SMC NECA Funds, Jacksonville P&F (collectively, “Lead Plaintiffs”) move the Court for entry of an Order, pursuant to Rules 23(a), 23(b)(3), and 23(g) of the Federal Rules of Civil Procedure: (i) certifying this action as a class action pursuant to Rules 23(a) and 23(b)(3); (ii) appointing Lead Plaintiffs Danica, Industriens, IBEW Local No. 58 / SMC NECA Funds, Jacksonville P&F, Industriens, and Operating Engineers Pension Trust Fund as Class Representatives of the Class pursuant to Rules 23(a) and 23(b)(3); (iii) appointing Labaton Sucharow LLP (“Labaton”) and Kessler Topaz Meltzer & Check, LLP (“Kessler Topaz”) Co-Class Counsel; and (iv) appointing Susan R. Podolsky as Class Liaison Counsel.

Dated: September 11, 2015

By: /s/ Susan R. Podolsky

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants on September 11, 2015.

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